

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)	
)	CHAPTER 13
DAINON TARQUINIUS SIDNEY)	CASE NO: 313-09063
SSN: XXX-XX-7845)	JUDGE: LUNDIN
605 Lakemeade Pointe)	
Old Hickory, TN 37138)	
)	
Debtor)	

EXPEDITED MOTION TO EXTEND THE AUTOMATIC STAY

1. Comes the debtor, through counsel, Salas Law Group, PLLC, and moves the court for an order extending the automatic stay of 11 USC §362 as to all scheduled creditors until the debtor's Chapter 13 case is either discharged or dismissed.

2. Routine notice may require the debtor to wait until after the automatic stay has expired before it can enter an order extending the automatic stay which may result in irreparable harm to the debtor and the debtor cannot afford to not be under the protection of the bankruptcy code.

3. Debtor's counsel will give the US Trustee and Chapter 13 Trustee's office notice electronically and all other creditors notice via US Mail and/or notice via the court's electronic noticing system.

4. Debtor requests that the expedited hearing be set on Wednesday, November 13, 2013, at 8:30 a.m. in Courtroom 1, Customs House, 701 Broadway, Nashville, TN 37203.

5. Debtor would state in support of this motion as follows:

Debtor moves the court for an order extending the automatic stay of 11 USC §362 as to all scheduled creditors until the case is either discharged or dismissed. According to the

debtor, his previous Chapter 13 case was dismissed for nonpayment because he became unemployed. He has now obtained regular employment and has assistance to fund the plan from his ex-wife. Debtor believes that he can fund this Chapter 13 plan. Debtor attaches an affidavit hereto to this motion which states that he believes he filed this Chapter 13 case in good faith.

WHEREFORE, PREMISES CONSIDERED, debtor moves the court that the automatic stay of 11 USC §362 be extended until her plan is either discharged or dismissed.

Respectfully Submitted,

/s/ Maria M. Salas

Maria M. Salas #015646

Salas Law Group, PLLC

Attorney for Debtor(s)

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Nashville, TN 37203

(615) 244-6246 (telephone)

(615) 386-3708 (facsimile)

notice@salaslawgroup.com

CERTIFICATE OF SERVICE

I certify that on this 5th day of November, 2013, I mailed/mailed a copy of the foregoing to the Office of the Chapter 13 Trustee, P.O. Box 340019, Nashville, TN 37203; to the Office of the U.S. Trustee, Customs House, 701 Broadway, Nashville, TN 37203; to the debtor(s) at the above referenced address; and to all creditors and parties in interest per attached matrix.

/s/ Maria M. Salas

Maria M. Salas

TOTAL MAILINGS: 20

13-9063

Austin Peay State University
c/o NCO Financial
PO Box 15636
Wilmington DE 19850

Barclays Bank Delaware
700 Prindes Xing
Newark DE 19713

Charter Communicatinos
223 S. College Street
Lebanon TN 37087

Chase Manhattan Mortgage
PO Box 24696
Columbus OH 43224

Credit First, NA/Firestone
PO Box 81083
Cleveland OH 44181

Davidson County Chancery Court
Ste 308
1 Public Square
Nashville TN 37201

Davidson County General Sessions Court
408 2nd Avenue, North
Nashville TN 37201

Davidson County Reg of Deeds
501 Broadway, Ste. 501
Nashville TN 37203

Excel ERS, LLC
c/o James R. Tomkins, Esq.
214 2nd Avenue North, #100
Nashville TN 37201

FIA CSNA/Bank of America
PO Box 982235
El Paso TX 79998

IRS Centralized Insolvency Operation
PO Box 7346
Philadelphia PA 19101

Nashville Electric Service
1214 Church Street
Nashville TN 37246

Ocean Beach Club, LLC
932 Laskin Road
Virginia Beach VA 23451

OneWest Bank
c/o Shapiro & Kirsch, LLP
555 Perkins Road Extended, Second Floor
Memphis TN 38117

State Farm Financial Services
3 State Farm Plaza, N-3
Bloomington IL 61791

SunTrust Bank
PO Box 85526
Richmond VA 23285

SunTrust Bank
PO Box 85092
Richmond VA 23286

The Bank of Nashville
401 Church Street
Nashville TN 37219

Valinda Burks
605 Lakemeade Pointe
Old Hickory TN 37138

